



## ORANGE/CHATHAM SIERRA CLUB

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North Carolina Environmental Management Commission  
Public Comment Hearing, July 12, 2007

I'm Judith Ferster, 228 Carolina Meadows Villa, Chapel Hill, 27517. I speak for the Executive Committee of the Orange/Chatham Sierra Club. We have been following the stakeholder deliberations attempting to create new rules to remedy the nutrient pollution in Jordan Lake.

We support the major goals of these rules but have several concerns.

- We should require that wastewater treatment plants upstream from the lake reduce nitrogen by 2011 as originally recommended. A proposal that would allow water treatment plants to wait until 2016 to make deeper reductions in nitrogen is far too slow. The Clean Water Responsibility Act (H.R. 515) was passed in 1997. If implementation is not required until 2016, that will mean that amelioration will have taken almost 20 years, during which time nutrients will have continued pouring into the lake. Given that the lake was known to be vulnerable to nutrient pollution almost immediately after the dam was closed to form the lake, the waste water treatment facilities in the watershed have had ample warning about the need to upgrade facilities, and some have begun to do so. Therefore there should be no more delay. All the plants should be required to come into compliance by the original date of 2011.
- In addition, there should be stricter controls on polluted runoff from existing development. For instance, 29% of the phosphorus and 38% of the nitrogen flowing into Jordan Lake come from residential sources. Scientific models show Jordan Lake will never be healthy unless runoff from current development is reduced. These controls consist of biological and engineered filters that slow down the flow of rainwater, filter out soil suspended in it, and allow natural processes to clean up the water before it flows into a stream. They can reduce nutrients—as well as other pollutants—flowing into the lake.

The purposes of the lake include flood control, recreation, providing fish and wildlife habitat to protect biodiversity, and water supply. Most of those purposes are foiled by eutrophication, the result of nutrient pollution. The Environmental Management Commission should approve strong new rules for the lake without delay.

19,000  
members of the  
NC Sierra  
club